

September 22, 1988

William E. Muno  
Office of RCRA - USEPA Region 5  
230 South Dearborn St.  
Chicago, IL 60604

US EPA RECORDS CENTER REGION 5



1002072

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SEP 26 1988

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

RE: Information - Allied facility #ILD 005 463 344

Dear Mr. Muno:

As part of a recent FOIA request, we have received and reviewed a copy of the "Loss of Interim Status Inspection" report, Contract number 68-01-7037, prepared by PRC Engineering for USEPA relative to this facility. This is the latest in a series of documents we have reviewed which address ground and ground water contamination at the site, and we have found what we feel are serious errors and omissions in fact pertaining to the way wastes were and are handled at the facility. Errors that can be easily documented include, but are not limited to:

- D-2 The site has three closed ponds, not two. The three areas are shown on the attached facility layout FMP-22, attached, from IEPA's Facility Management Plan, and the report authors' erroneous references to two ponds infers they excluded the third area from consideration as a potential source of contamination. For further detail, see the descriptions of the pond sites contained in paragraph 17, FMP-19, attached.
- G-1 The sump associated with the injection well, process D79, is 10 feet by 10 feet by 25 feet. Other documents place its capacity at 10,000 gallons. Yet G-1 #2 lists 430,000 gallons, and G-1 #4 lists an additional 450,000 gallons of pre-injection (shown as pre-inspection) wastes. This 880,000 gallons of storage is not shown to exist as UIC related storage in any of the UIC permit capacity reports. Is it to be considered as capacity covered under UIC?
- H-5 Does not address existence or closure of the third pond referred to in D-2 above. Thus any monitoring or leakage from this area may be escaping review.
- H-6 #7 fails to reflect the significant quantities of carbon tetrachloride leakage, recovery, and shipment, and omits other significant components of the facility's acknowledged waste streams. The question has been incompletely answered. See FMP-60 through 63, attached.
- H-7 This has been incorrectly answered. Some of the closed surface impoundments were backfilled with hazardous waste and/or materials during the process of closure. IEPA's FMP acknowledges the likely presence of hazardous solid waste and materials being present in the enclosures. See FMP-15, attached. Even though the units are officially closed, we believe that they still contain, and can leak, hazardous waste. Leakage or leachate emanation from the surface impoundments has been noted and documented in several official inspection reports, see FMP-13, attached, and in

cc: Joseph Boyle, Enforcement  
Attachments, 22 pages

Yours truly,

Vincent Koers  
Coordinator



Planning Research Corporation

**PRC Engineering**

312-600  
East Wacker Drive  
Chicago, IL 60601  
312-333-0300  
312-310-2215112  
CONTOWENG

**ALLIED CHEMICAL CORPORATION, DANVILLE WORKS**

**(ILD 005 463 344)**

**U.S. EPA REGION 5**

**LOSS OF INTERIM STATUS INSPECTION**

**REPORT-CHECKLIST**

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
Office of Waste Programs Enforcement  
Washington, D.C. 20460

Work Assignment No. : 507  
EPA Region : V  
Site No. : ILD 005 463 344  
Date Prepared : June 6, 1986  
Contract No. : 68-01-7037  
PRC No. : 15-5070-00  
Prepared By : PRC Engineering  
(Daniel T. Chow)  
Telephone No. : 312/938-0300 ext. 429  
EPA Primary Contact : William E. Muno  
Telephone No. : 312/886-4434

**PRIVILEGED WORK PRODUCT PREPARED  
IN ANTICIPATION OF LITIGATION**

**ENFORCEMENT  
CONFIDENTIAL**

# INSPECTION CHECKLIST

## LOIS INSPECTIONS - REGION 5

Facility Name: Allied Chemical Corporation, Danville Works

Site I.D.: ILD 005 463 344

Inspection Date: March 19, 1986

Inspector(s): Noel Simmons and Tom Hahne

<u>Completed</u>	<u>Not Required</u>	<u>Item</u>	<u>Page</u>
<u>X</u>	<u>          </u>	General Information	B-1
<u>X</u>	<u>          </u>	Summary Report	C-1
<u>X</u>	<u>          </u>	Notes, Other Observations, and Recommendations	D-1
<u>X</u>	<u>          </u>	List of Site Contacts	E-1
<u>X</u>	<u>          </u>	List of Site Documents	F-1
<u>X</u>	<u>          </u>	List of Inspected Waste Management Units	G-1
<u>X</u>	<u>          </u>	Inspection Questionnaire	H-3

**NOTES, OTHER OBSERVATIONS AND RECOMMENDATIONS**  
(Continued)

application (G. M. Kadv. personal communication). This well operates under the  
U.I.C. regulation of the State of Illinois. Allied has applied for a permit for  
the well, but at this time, the permit has not yet been issued.

On October 28, 1985, Allied submitted a revised Part A application to IEPA  
(with a copy also sent to U.S. EPA). On December 20, 1985, U.S. EPA Region V  
sent a letter acknowledging the revised Part A and the withdrawal of S02 and  
T04 based on less than 90-day storage.

The site additionally has two closed treatment ponds. These ponds were operated  
and closed prior to RCRA implementation (personal communication, G. M. Kadv).

**LIST OF INSPECTED WASTE MANAGEMENT UNITS**

U.S. EPA Process Code/Unit	Field Observations
1. <u>T02</u>	<u>The two closed treatment ponds</u> <u>have been filled and covered. They</u> <u>support a healthy turf cover.</u>
2. <u>D79</u>	<u>Underground injection well and</u> <u>430,000 gallon aboveground</u> <u>storage tank used to collect and</u> <u>store wastes; wastes are injected</u> <u>intermittently (less than 90 days</u> <u>storage) according to Mr. Kady.</u>
3. <u>S01</u>	<u>Drum storage area is a covered</u> <u>area and the drums are stored</u> <u>there for less than 90 days.</u> <u>according to Mr. Kady.</u>
4. <u>S02</u>	<u>Large 450,000 gallon capacity above-</u> <u>ground storage tank surrounded by</u> <u>earthen berm. Tank is used to</u> <u>store waste prior to inspection</u> <u>(D79)</u>

PRC Inspector(s): Noel Simmons and Tom Hahne  
Inspection Date: March 19, 1986

RCRA Site I.D. ILD 005 463 344

- 5) Does this facility have any inactive landfills, surface impoundments, waste piles, or land treatment sites?

Y, I (1)

Yes - In the space provided below, list the status of any inactive hazardous waste operation, obtain a copy of all pertinent closure documents, and visit the closed units.

No - Continue to the next question.

<u>General Description of Unit Process</u>	<u>U.S.EPA Process Code</u>	<u>Closure Status</u>
_____	_____	_____
<u>Treatment Ponds</u>	<u>T02</u>	<u>CPA</u>
<u>Treatment Ponds</u>	<u>T02</u>	<u>CPA</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Remarks: These units were closed before November 19, 1980 according to Mr.

Kady. According to Mr. Kady, IEPA approved closure of these units.

PRC Inspector(s): Noel Simmons and Tom Hahne  
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RCRA Site I.D. ILD 005 463 344

- 6) Is hazardous waste being generated at this facility?

Y. I (1)

Yes - Continue to the next question.

No - Continue to the next question.

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- 7) In the past, was hazardous waste other than those listed in Question No. 6 generated at this facility?

Y. I (1)

Yes - Continue to next question.

No - Continue to next question

Remarks: The facility made two one-time shipments: nitromethane (D003)  
was shipped off-site on April 3, 1981 and methylethyl ketone (D001) was  
shipped off-site on May 17, 1984. Mr. Kady indicates that the facility's  
processes have not changed significantly in the last 10 years.

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- 8) Is hazardous waste being stored in surface impoundments (S04) or waste piles (S03) at this facility?

N.I.(1)

Yes - In the space provided below, list storage unit currently being used and EPA process codes; continue to the next question.

No - Continue to the next question.

<u>General Description of Waste Storage Unit</u>	<u>EPA Process Code</u>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
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<hr/>	<hr/>

Remarks: 

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PRC Inspector(s): Noel Simmons and Tom Hahne  
Inspection Date: March 19, 1986

RCRA Site I.D. ILD 005 463 344

- 9) In the past, was hazardous waste stored in surface impoundments (S04) or waste piles (S03) other than those listed in Question No. 8 at this facility?

N.I.(1)

Yes - In the space provided below, list inactive storage waste units, EPA process codes, and closure status. Obtain pertinent closure documents and inspect storage units. Continue to the next question.

No - Continue to the next question.

<u>General Description of Waste Storage Unit</u>	<u>U.S.EPA Process Code</u>	<u>Closure Status</u>

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RCRA Site I.D. ILD 005 463 344

**Y**

**No - Continue to the next question.**

Remarks: Allied began generating arsenic waste (D004) in 1984, according to  
Mr. Kady. Mr. Kady also said that carbon tetrachloride waste (U211) was injected  
between 1982 and 1984.

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- 13) In the past, was hazardous waste other than those listed  
in Question No. 12 shipped from this site?

NA

Yes - Complete the information requested below; obtain a  
copy of the first manifest after closure of the land-based  
waste management unit(s) and the last manifest (if available);  
and continue to the next question.

No - Continue to the next question.

<u>Type of Wastes</u>	<u>First Shipping Date</u>	<u>Last Shipping Date</u>	<u>Manifest Availability (Yes or No)</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PRC Inspector(s): Noel Simmons and Tom Hahne  
Inspection Date: March 19, 1986

RCRA Site I.D. ILD 005 463 344

- 15) In the past, was hazardous waste land applied (D81) or disposed of in landfills (D80), or in surface impoundments (D83), other than those listed in Question No. 14, at this facility? N.I.(1)

Yes - In the space below, list the inactive (closed) disposal units, U.S. EPA process codes and closure status. Obtain pertinent closure documents and inspect the closed units; continue to the next question.

No - Continue to the next question.

<u>Inactive Disposal Units</u>	<u>U.S. EPA Process Code</u>	<u>Closure Status</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name of Preparer: Karen Nachtwey  
 Date: June 1986

Model Facility Management Plan

JUL 02 1986

U.S. EPA. REGION 1

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 JUL 04 1986  
 U.S. EPA. REGION 1

1. Facility Name: Allied Corporation

2. Facility I.D. Number: ILD005463344

3. Owner and/or Operator: Richard Purgson

4. Facility Location: Brewer Rd., P.O. Box 13  
Street Address

<u>Danville</u>	<u>Vermilion</u>	<u>Illinois</u>	<u>61832</u>
City	County	State	Zip Code

5. Facility Telephone (if available): (217) 446-4700

6. Interim Status and/or Permitted Hazardous Waste Units and Capacities of Each Unit:

<u>Type of Units</u>	<u>Size or Capacity</u>	<u>Active or Closed</u>
S01 Storage in Tanks or	Drums 20,000 G	Closed 11/25/85
S02 Containers	Tanks #30 20,000 G	Store 90 days
	#34 20,000 G	Store 90 days
Incinerator	#40 420,000 G	Withdrawn from Part A
	process 19,000 G	
Landfill	pump	
Surface Impoundment		
Waste Pile		
Land Treatment		
D79 Injection Wells	216,000 G	Withdrawn from Part A
T04 Others (Specify)	14 G/day	Withdrawn from Part A
Recovery Wells 6	CCI 4	Withdrawn from Part A

7. Permit Application Status: NONE (HMDMS action item number)

FMP-1



DATE: June 4, 1986

TO: Karen Nachtwey, DLPC/Permit Section

FROM: William E. Zierath, DLPC/FOS - Central Region

SUBJECT: LPC #1838040027 - Vermilion County - Allied Chemical - ILD #005463344 - RCRA/FMP

FIVE  
JUN 11 1986  
DLPC

## FMP Responses

3. Complaints - none in files.

4. Inspections

12/9/76, 12/10/76 and 12/11/76 - IEPA (R. Piskin)

Inspector observed the installation of a new injection tube in the deep well.

6/14/77 - IEPA (R. Piskin)

UIC inspection - facility in general compliance

3/23/79 - IEPA (R. Piskin)

Inspector observed two surface impoundments used for waste storage. One pond, called the "effluent pond" was an unlined impoundment measuring 360' x 80' x 6'. The other pond, called the "residue pond", was also unlined and measured 270' x 310' x 6'.

6/6/79 - IEPA (R. Piskin)

Inspector observed liquid seeping out of "residue pond".

6/2/80 - IEPA (R. Hersemann and R. Johnson)

Waste material had been drained from the "effluent pond". The ditch around the pond was being filled in.

7/11/80 - IEPA (R. Hersemann)

"Effluent pond" was in the process of being filled in.

8/28/80 - IEPA (R. Hersemann)

UIC inspection - facility found to be in general compliance.

4/2/81 - IEPA (Phil Weston)

RCRA inspection - facility in general compliance.

8/21/81 - IEPA (R. Hersemann)

UIC inspection - facility in general compliance.

June 4, 1986  
LPC #1838040027 - Vermilion County  
Allied Chemical  
ILD #005463344  
RCRA/FMP

Page 3

12/20/84 - IEPA (R. Hersemann)

UIC inspection - facility in general compliance.

7/30/85 - IEPA (D. Jansen)

RCRA inspection - facility in general compliance.

3/14/85 - IEPA (J. Withers and J. Student)

UIC inspection - facility in general compliance.

6/13/85 - IEPA (R. Hersemann)

UIC inspection - facility in general compliance.

9/27/85 - IEPA (D. Elenberger)

UIC inspection - facility in general compliance.

10/28/85 - IEPA (B. Filson)

UIC inspection - facility in general compliance.

1/29/86 - IEPA (W. Zierath)

Closure inspection for drum storage area. Facility was closed.

3/18/86 - IEPA (S. Dusenbury)

UIC inspection - facility in general compliance.

4/29/86 - IEPA (S. Dusenbury)

UIC inspection - facility in general compliance.

5. As stated above in the description of the March 23, 1979, inspection, this facility had two surface impoundments which were eventually drained in early 1980 and filled in. Since one of the problems noted with the surface impoundments was reduced storage capacity due to sediment buildup, it is possible that some solid waste materials remain in the old surface impoundments.

In addition, a review of our files indicated that Allied has an ongoing carbon tetrachloride recovery project from a large slug discovered under the railroad unloading area of the facility.

FMP-15

13.

<u>General Waste Type</u>	<u>Source of Waste</u>	<u>Facility Type</u>
Organics Inorganics Heavy Metals Acids Bases	Chemical, General	Landfill Impoundment

15. Allied Chemical Corp. manufactures and packages refrigerants and aerosol propellants. Waste hydrochloric acid is generated as a by-product. Acid wastes are deep well injected, other wastes are stored in containers. 157,500 tons of corrosive waste, constituents include hydrochloric acid, tetrachloromethane U211, and rainwater are disposed through injection annually, the injected (deep well) wastes have a pH of less than 2.0. An arsenic-antimony sludge is produced twice a year after the sumps are cleaned out, roughly 1100 kilograms are produced and disposed or shipped off-site. Paint sludges are also generated along with carbon tetrachloride. On June of 1979, carbon tetrachloride was found in the groundwater as reported by Geraghty and Miller, Inc. This find could be a direct result of the storage, disposal, and handling of wastes at this facility. A surface impoundment (storage pond) was once utilized by this facility. Impoundment is now closed.

The potential for surface water contamination exists due to the surface water drainage channels that lead to surface water and contamination of groundwater with carbon tetrachloride did happen. The disposal and handling practices of this facility leads to a great potential for soil and groundwater contamination. Also, landfills and surface impoundment leaks and groundwater is potentially affected.

KLP:jp:4/2



17. 1954 installed "east lagoon" 100' x 500' to use for emergency temporary storage of aluminum chloride (27% AlCl<sub>3</sub> and 2% fluoride) until storage facilities were completed, i.e. a lagoon due west of the east lagoon, 1000 ft<sup>2</sup> x 5' deep. Acid leakage from pumps, pipes and the lagoon are reported as early as 1956. Acid readings were repeatedly found in a tributary to Lick Creek. Allied attempted to neutralize the flow with lime and recirculate the discharge back to their lagoons.

Another lagoon, 350 ft. long x 270 ft. wide south of railroad spurs was constructed in September 1958. Leakage also occurred from this lagoon. In 1959 Allied Chemical negotiated with the Danville Sanitary District to discharge waste into the District's sewer. Constituents levels were set for chlorides, fluorides, aluminum and pH.

In the 1960's sampling observations discovered all wastes were not being discharged to the Sanitary District. A U shaped lagoon 100' long was dug to neutralize muriatic acids leaking from residue pond. Due to operational changes and deterioration of the highway storm sewer system and manholes, unacceptable concentrations of dissolved solids, chlorides and fluorides, pH, COD, Aluminum, and suspended solids entered the Danville Sanitary District and tributary to Lick Creek.

Corrective measures were continuously being taken but not to the extent to stop the problem. The Illinois Pollution Control Board issued a Board Order in May, 1971 which among other provisions banned any future connection to the Districts' facilities until certain level of effluent quality were maintained.

To resolve their problems Allied proposed deep well disposal of their waste. A construction permit for the deep well was granted in June 1972, the operating permit in March of 1973. However, due to mechanical failure, the permit needed modification and actual operation started in November 1973. A temporary holding pond was also placed in service for process waste waters. It is questionable if it has a polyethylene lining. Numerous other releases caused by replacement or malfunction of equipment and heavy rainfalls are described in memos and letters in Agency files. By 1975 Allied control program i.e., collection sumps, dam, sluice gate, run-off control adequately prevented the past water pollution problems.

In September 1979 Geraphty and Miller investigated the groundwater pollution at Allied Corporation Groundwater pollution and carbon tetrachloride pollution was discovered under the unloading and storage area located along the railroad tracks west of the active pond. The wastewater pond was also found to be a source. As a result corrective measures were taken, monitoring wells were installed and a monitoring program was established as described in Attachment G.

(Six recovery wells exist for the recovery of carbon tetrachloride.)

18. Documentation of release are too numerous to list. Most of the releases occurred prior to the operation of Allied's deep well injection i.e. from 1955-1973. Reports are in the form of Memos and Letters in Agency files.

Examples:

1954-57

Memo or letter from Wm. A. Hasfurther and W. T. Smity, Sanitary Engineer, and C. W. Klassan of the Sanitary Water Board to division file or Allied Chemical.

1958 & 59

Letters and Memos to Department of Public Health to K. L. Baumann from Ralph Evans, Bureau of Stream Pollution.

May 1960

Notes from investigation from stream pollution complaint from Mr. Walt Garvey, Manager of the Danville Sanitary District by K. L. Baumann.

April 21, 1970

Summary of Laboratory Analysis and Memos to Bureau of Stream Pollution Control -- Ward Akers from G. T. Bachman.

May 25, 1972

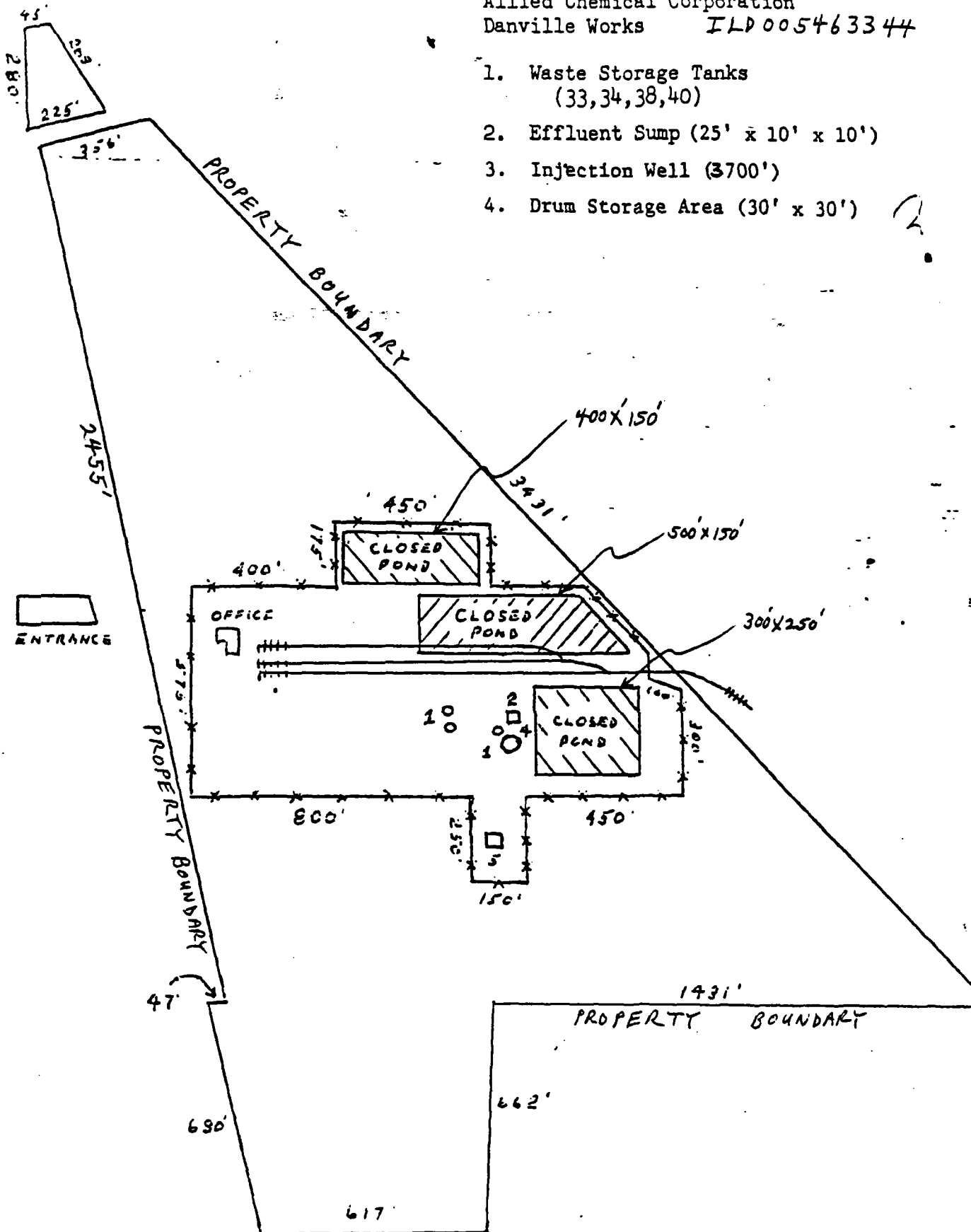
Memo to Division of Water Pollution Control from G. T. Bachman (SbCl<sub>3</sub>) spill.

KN:rd/sp1339F/1-3

## V. FACILITY DRAWING (see page 4)

Allied Chemical Corporation  
Danville Works ILP 005463344

1. Waste Storage Tanks  
(33,34,38,40)
2. Effluent Sump (25' x 10' x 10')
3. Injection Well (3700')
4. Drum Storage Area (30' x 30')



SCALE APPROX.  $\frac{1}{4}" = 100'$

217/782-6300

November 6, 1979

Mr. W. C. A. Schrader  
Plant Manager  
Allied Chemical Corporation  
Post Office Box 13  
Danville, Illinois 61832

Dear Mr. Schrader:

Re: Permit No. 1979-UIC-3-OP

Your letter dated September 25, 1979, and the attached report prepared by Geraghty and Miller, Inc., have been received and reviewed by the Agency. This letter includes comments based on that review.

1. As it was stated in the report, the pollution of the ground water occurred beneath the plant property.
2. Carbon tetrachloride pollution is beneath the unloading and storage areas which are located along the railroad tracks on the west of the active pond. Another distinctive ground water pollution is under the active pond and extends westward. Chloride, fluoride, sulfate, antimony and high electrical conductance readings are some of the indicators of the pollution in the area.
3. We request that the activities causing the pollution of the ground water shall be ceased and remedial actions shall be initiated to restore the quality of the ground water.
4. Carbon tetrachloride pollution
  - a. The leakage, seepage, discharge, spill or any other sources of pollution shall be identified and measures shall be taken to prevent future occurrence.
  - b. As you suggested in your letter an abatement facility shall be installed to recover carbon tetrachloride from the ground water.
  - c. A monitoring program shall be undertaken in accordance with Item 6 of this letter.
5. Wastewater Pond
  - a. Use of the pond shall be discontinued immediately.
  - b. Liquid in the pond shall be drained and disposed of properly.
  - c. The pond shall be filled with inert material, and
  - d. The pond shall be covered with a final cover as indicated on the Proposed Wastewater Pond Closure Design. The top of the pond shall be properly graded to prevent ponding of the precipitation. The designed plan shall be modified to indicate the proper grade.

FMP-60

- e. A monitoring program shall be undertaken in accordance with Item 5 of this letter.
- f. Presently, the pond is under the deep well permit. Therefore, the pond closure requires a Supplemental Permit to the existing Operating Permit from the Agency. The application forms for a Supplemental Permit to modify site operation and blank forms of the notification letter are included.

Please complete these forms and modify Wastewater Pond Closure Design and submit them to the Agency to obtain the necessary Supplemental Permit.

6. Monitoring

- 1. All the wells installed by Geraghty and Miller shall be kept operational that the Agency or plant personnel can sample them in the future.
- 2. The following wells will be sampled and analyzed to establish background concentrations: W-1, W-5, W-24, W-20, W-30, W-23, W-28, W-2, W-10, W-11, W-12, W-7, W-8, W-6, and W-21C. Parameters to be analyzed are marked on the analyses forms which are enclosed.

Subsequent to background analyses same wells will be sampled and analyzed quarterly for the following parameters: CCL<sub>4</sub>, Cl, SO<sub>4</sub>, F, ROE, B, COD, Sb. Quarters end on January 15, April 15, July 15, and October 15.

If you have any questions on the above matters or would like to meet with us to discuss this subject, please contact me.

Sincerely,



Rauf Piskin, Manager  
Hydrogeology Unit  
Technical Operations Section  
Division of Land/Noise Pollution Control

RP:bls/8794,2,3

Enclosure

cc: Tom Cavanagh

FmP-61



Specialty Chemicals Division  
P.O. Box 13  
Danville, Illinois 61832  
(217) 446-4700

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DEC 26 1979

E.P.A. - D.I.D.C.  
STATE OF ILLINOIS

December 20, 1979

Mr. Rauf Piskin  
Manager Hydrogeology Unit  
Technical Operations Section  
Division of Land/Noise Pollution Control  
Churchill Road  
Springfield, Illinois 62706

Re: Permit No. 1979-UIC-3-CP

Dear Mr. Piskin:

In reference to your letter of Nov. 6, 1979 and the meeting held in Springfield on Dec. 4, we have developed the following program in answer to your questions and areas of concern:

1. Carbon Tetrachloride Pollution

- a. The sources of the carbon tetrachloride contamination found in the Geraghty & Miller study were apparently leaks and drips from the tank car unloading connections, spills from the unloading hoses when disconnecting, seal leaks from the unloading pumps and a leak in the storage tank which occurred several years ago and was subsequently repaired. Temporary remedial measures taken to prevent contamination include: 1) placing drip pans under all tank car connections, 2) instructing operators to report all leaks immediately and to exercise caution in disconnecting hoses so that any carbon tetrachloride remaining in the hoses will be contained in the drip pans, 3) continued prompt repair of leaks. For longer range action, hose couplers with internal check valves are on order and will be installed on the end of the unloading hoses. Engineering is presently designing a permanent drip collection system which will include installation of curbing around the unloading pumps to contain any seal leaks.
- b. We have contracted with Geraghty & Miller to conduct additional test to better define the extent of the carbon tetrachloride contamination. Program for definition of extent of carbon tetrachloride contamination will be developed in January 1980. Development of an abatement program will be contingent upon results obtained in the study.

FMP-62

- c. Sampling of monitoring wells, which you suggested, will begin in January 1980 in order to develop background concentrations of selected parameters. Subsequent quarterly monitoring will begin in the following quarter.

2. Wastewater Pond

- a. Use of the pond has been discontinued and all process lines to the pond and surrounding ditch have been removed. However, the sump pump, in the ditch is still operational so that if heavy rainfall occurs, contaminated rainwater from the ditch surrounding the pond can be pumped back into the pond. The level in the pond is being lowered by draining to the new collection sump which in turn "feeds" the deepwell.

Plans for pond closure are being developed and will be submitted as a Supplemental Permit Application.

- b. The hypochlorite decomposition system was put into operation on November 21 and is performing satisfactorily, with the exception of normal startup problems. A spare pump is already installed and we have intentions of installing an additional tank and cooler to provide additional backup.
- c. We had intended to procure an emergency generator to operate the sump pumps if a power failure occurred. However, in discussions with the Illinois Power Company, the possibility of installing an alternate high voltage supply line was considered. Their high voltage line has never failed in 14 months operation and it may be much more cost effective and productive to go this route rather than procure an emergency generator which has limited capabilities. Discussions with Illinois Power are continuing.

3. Monitoring

All the wells installed by Geraghty & Miller are operational except for W38. As previously discussed, this well was removed in order to install the new collection sump. Quarterly monitoring for the parameters specified in your letter will proceed after background monitoring is completed.

If you have any questions concerning this program, please telephone me.

Very truly yours,  
Allied Chemical Corporation

*W. C. A. Schrader*

W. C. A. Schrader  
Plant Manager

WCAS/ckm/njh

FMP-63

September 22, 1988

RECEIVED  
SEP 27 1988

Joseph Boyle  
Chief, Technical Enforcement Section  
USEPA Region V  
230 South Dearborn St.  
Chicago, IL 60604

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

RE: 5HR-12 Facility #ILD 005 463 344 - Allied Chemical, Danville, IL

Dear Mr. Boyle:

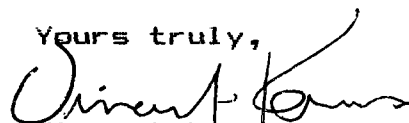
We have attached a copy of a recent communication with Mr. William Muno regarding the inaccuracies contained within a recent document his section supplied to us entitled "Loss of Interim Status Inspection" Report.

The gist of our position is that inaccuracies in the report result in communicating to readers the erroneous position that there are not significant contamination problems at this facility.

If this is the same document that you referred to in your letter of 14 September ( "IEPA and U.S. EPA are in the process of evaluating all TSDR facilities that have not received a RCRA permit") Then we most certainly want to draw to your attention that the reliability of the report as it presently stands is nonexistent.

We would like to know what your section's position is relating to this report, and to what degree it has been a part of your decision-making. Please advise what steps we can pursue to insure the work is redone accurately.

Yours truly,

  
Vincent Koers  
Coordinator



September 22, 1988

William E. Muno  
Office of RCRA - USEPA Region 5  
230 South Dearborn St.  
Chicago, IL 60604

RE: Information - Allied facility #ILD 005 463 344

Dear Mr. Muno:

As part of a recent FOIA request, we have received and reviewed a copy of the "Loss of Interim Status Inspection" report, Contract number 68-01-7037, prepared by PRC Engineering for USEPA relative to this facility. This is the latest in a series of documents we have reviewed which address ground and ground water contamination at the site, and we have found what we feel are serious errors and omissions in fact pertaining to the way wastes were and are handled at the facility. Errors that can be easily documented include, but are not limited to:

- D-2 The site has three closed ponds, not two. The three areas are shown on the attached facility layout FMP-22, attached, from IEPA's Facility Management Plan, and the report authors' erroneous references to two ponds infers they excluded the third area from consideration as a potential source of contamination. For further detail, see the descriptions of the pond sites contained in paragraph 17, FMP-19, attached.
- G-1 The sump associated with the injection well, process D79, is 10 feet by 10 feet by 25 feet. Other documents place its capacity at 10,000 gallons. Yet G-1 #2 lists 430,000 gallons, and G-1 #4 lists an additional 450,000 gallons of pre-injection (shown as pre-inspection) wastes. This 880,000 gallons of storage is not shown to exist as UIC related storage in any of the UIC permit capacity reports. Is it to be considered as capacity covered under UIC?
- H-5 Does not address existence or closure of the third pond referred to in D-2 above. Thus any monitoring or leakage from this area may be escaping review.
- H-6 #7 fails to reflect the significant quantities of carbon tetrachloride leakage, recovery, and shipment, and omits other significant components of the facility's acknowledged waste streams. The question has been incompletely answered. See FMP-60 through 63, attached.
- H-7 This has been incorrectly answered. Some of the closed surface impoundments were backfilled with hazardous waste and/or materials during the process of closure. IEPA's FMP acknowledges the likely presence of hazardous solid waste and materials being present in the enclosures. See FMP-15, attached. Even though the units are officially closed, we believe that they still contain, and can leak, hazardous waste. Leakage or leachate emanation from the surface impoundments has been noted and documented in several official inspection reports, see FMP-13, attached, and in

Muno, September 22, 1988, page 2, continued...

other documentation. There is good reason to suspect that the units contain, and leak, hazardous waste. Quoting from IEPA's FMP, "landfills and surface impoundment leaks and groundwater is potentially affected." See FPM-18, attached. Further, "documentation of releases (of wastes) are too numerous to mention," FPM-21, attached. Carbon tetrachloride ground pollution has been documented under one pond area and elsewhere at the facility. See FPM-60 through 63, attached.

H-8 The "no" response to #9 is incorrect. Waste was stored in at least three separate locations at one time or another, and each area should be included here.

H-11 The list of wastes shown in #12 is incomplete. Antimony residues, demisters, spent filters, and other unlisted waste streams existed at the time of preparation of this report, and before. These wastes and others have been omitted here.

H-12 #13 does apply, and the "NA" answer is inaccurate. Wastes other than those listed in #12 have been shipped from the facility.

H-14 The "No" answer for #15 is incorrect. Hazardous waste has been formerly disposed of in surface impoundments at this facility, contrary to the answer provided here.

This document fails to address and document other environmental contamination problems which have occurred over the years at the facility, and which are not related directly to the UIC operation. These are said by Allied to be related to manufacturing and unloading operations, but leakages have occurred allowing the loss of hazardous waste or hazardous materials into the environment that have yet to be properly addressed. At least one such leakage has been the subject of a corrective action program that is alleged to have failed, permitting the movement of chemicals offsite onto adjacent private property.

This report is a key instrument in USEPA's evaluation mechanism for RCRA enforcement evaluation, and it fails to mention or address well-established and documented instances of contamination with hazardous materials or wastes at the facility.

We feel that the inaccuracies in this document mask the actual contamination of the environment that has occurred, and continues to occur at this facility, and we ask that the document be reviewed and corrected so that USEPA is fully and correctly appraised of our problems with this waste site.

cc: Joseph Boyle, Enforcement  
Attachments, 22 pages

Yours truly,

Vincent Koers  
Coordinator



Planning Research Corporation

**PRC Engineering**

312/938-0300  
100 East Wacker Drive  
Chicago, IL 60601  
312/938-0300  
312/938-2215112  
DANIEL T. CHOW

**ALLIED CHEMICAL CORPORATION, DANVILLE WORKS**

(ILD 005 463 344)

**U.S. EPA REGION 5**

**LOSS OF INTERIM STATUS INSPECTION**

**REPORT-CHECKLIST**

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
Office of Waste Programs Enforcement  
Washington, D.C. 20460

Work Assignment No. : 507  
EPA Region : V  
Site No. : ILD 005 463 344  
Date Prepared : June 6, 1986  
Contract No. : 68-01-7037  
PRC No. : 15-5070-00  
Prepared By : PRC Engineering  
(Daniel T. Chow)  
Telephone No. : 312/938-0300 ext. 429  
EPA Primary Contact : William E. Muno  
Telephone No. : 312/886-4434

**PRIVILEGED WORK PRODUCT PREPARED  
IN ANTICIPATION OF LITIGATION  
ENFORCEMENT  
CONFIDENTIAL**

August 5, 1988

RECEIVED  
AUG 15 1988  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION 5

Joseph Boyle  
RCRA Enforcement - USEPA Region 5  
230 South Dearborn St.  
Chicago, Il 60604

RE: Facility #ILD005463344 - Allied Chemical, Danville, Il

Dear Mr. Boyle:

We are interested in establishing what the USEPA is planning to do about pollution problems which we have come to learn exist at the above facility, and which it appears USEPA has been cognizant of for some ten years or more.

Our interests include, but are not limited to, a significant carbon tetrachloride spill, over 100,000 gallons, which has been the target of a series of recovery wells operating for some eight years.

Individuals in the neighborhood allege, and have some evidence to support, that one or more chemicals have escaped from the confines of the facility, and have invaded their property, and have and are causing bodily harm to them, their children, and their property. They have filed suit in federal court over this invasion.

Further, Arsenic has occurred in a surface spring a few hundred feet from the facility that has been used as a source of water for human consumption for decades. Allied has tried to characterize this contamination as a natural occurrence of arsenic, despite the fact that Allied drilled more than 40 test wells in the vicinity of their facility, in close proximity to the spring, without finding arsenic as occurring naturally prior to the beginning of the arsenic injection.

The Arsenic is particularly important not only for its own toxicity, but as a tracer of potential pollution problems. In the early 1980's Allied began to inject 200-500 pounds per day of arsenic into their deep well. The presence of the arsenic in the spring may well be evidence that either the injected wastes are returning to the surface, or that surface contamination from the facility is leaving


the facility and contaminating the shallow surface ground water supplies some distance away.

The federal legal requirement that all RCRA permits, including UIC RCRA permits, be preceded prior to issuance by a RCRA Facilities Assessment was intended specifically to prevent the awarding of new permits, including new UIC permits, without properly addressing old, long-standing pollution problems such as exist at this facility. The recent issuance of a new UIC permit by the State of Illinois (issued March 30, 1987 with an effective date of May 4, 1987) to the facility has effectively bypassed the requirements that an assessment be completed PRIOR to issuance of the permit. This permit has been temporarily stayed by the Illinois Pollution Control Board pending resolution of an appeal action filed by Allied. Meanwhile the facility is operating under the old provisions of the permit by rule, until IEPA completes their permit amendment process. The clock is running on the age of the permit, and it will expire four years after its issue date, in May of 1991.

There are indications that IEPA has referred the site to USEPA enforcement authorities at least twice since 1985, without apparent action by USEPA. There are also indications that USEPA permit section has referred the facility to enforcement recently, apparently to complete a RFA. I would like to learn if these referrals really occurred, and what the various referrals to USEPA enforcement authorities amount to, and what, if any, actions you see USEPA taking to address the inappropriate awarding of the UIC permit outside of the legal federal guidelines by the state.

Further, I would like to prompt you to thoroughly investigate the existing pollution indications which we have outlined above to help assure us that the area is indeed safe for human habitation.

Yours truly,

  
Vincent Koers  
Coordinator

**DANVILLE CITIZENS for CONTROL of HAZARDOUS WASTE INJECTION (DCCI)**

**603 West Woodlawn Avenue, Danville, IL 61832 217-443-0060**

1/9/87

**RECEIVED  
ENFORCEMENT PROGRAMS**

JAN 14 1987

Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706  
Att: John Williams

**Environmental Protection Agency**

RE: Allied Chemical Draft Permit Application #UIC-003-W1-AC

The membership of DCCI wants to take this opportunity to echo the comments presented on our behalf at the recent IEPA public hearing by Vincent Koers and others, and to include these items in the official written record of comments pertaining to the Allied Chemical deep well permit application.

1. Attachment I is enclosed, and is self-explanatory. It consists primarily of corrections and amplifications of items in the original comments presented at the hearing. These pre-punched pages should replace the corresponding pages in the original booklet. A second copy is attached, with the changes highlighted. This highlighted copy may be reviewed and discarded.
2. Allied Chemical's proposal to modify their operation by neutralizing their wastes prior to injection has taken us by surprise, and we question the manner in which this proposal is being included into the on-going permit process by the IEPA. We welcome the Corporation's concession of an item we have sought, and we understand the IEPA's impatience with further delaying the permit process, already over a year and a half old, but it is clear that Allied views this concession as a trade off for other proposed permit requirements that we do not feel should be relinquished. Further, we have requested

EXHIBIT 25

32

significant additional requirements be added to the permit, in addition to and concurrent with those special conditions proposed by the IEPA, which we feel are necessary, regardless of whether the waste is neutralized or not. If the IEPA intends to significantly reduce the special conditions which they have previously gone on record as intending to impose, then we have to respectfully ask that a new draft permit be prepared that accurately reflects the intentions of the IEPA, and that the public have an appropriate opportunity to study and comment upon that document.

3. Allied's 12/17/86 neutralization proposal should be rejected if it continues to be offered only as an either/or enticement to largely abandon the control features of the draft permit, and those offered through the hearing process by ourselves and others. Allied's offer to neutralize should be studied closely and implemented, but with essentially no reductions in stipulated requirements, because:

- A. The stipulations are designed to protect the environment from chemical reactions that will continue to occur, although perhaps at significantly reduced reaction rates, unless the pH is in fact fully neutralized. Even then, residual chemicals already in the ground may continue to react for an unknown period of time, which many authorities have taken to be for geologic time, or thousands of years, since no one has done the research to authoritatively demonstrate the actual active life of the chemicals in the ground.

- B. Allied's proposal does not assure that it intends to fully neutralize the waste, and oral comments by their representatives at the public hearing indicated that they did not intend to go

higher than 4 pH. The proposal also fails to provide for back up controls for the periods that their control is not working properly and is out of range. The control provisions of the draft permit are needed as back up in these situations.

C. However clean the waste stream is from now on, we have a 13-year legacy of acidic and toxic waste having been injected that we must continue to live with. The chemical toxicity of the waste, that is, the levels of the various waste constituents that would not be tolerated in USDW, were they verified to be there, is significant. And it is the material injected years ago that we are most likely to encounter first. Thus, we ask that a registry of waste stream components be created and become a required part of the well record, and of well permit draft applications in the future, composed of two sections:

1. Showing all chemicals currently in the waste stream.
2. Showing all chemicals not currently in the waste stream, but which have been reasonably documented in the waste stream during the past, or which may reasonably have been suspected to have been present in the waste stream, but which may not have been fully documented.

This registry should show the levels at which the components were in the waste stream, and the levels which are permitted in the current drinking water laws for water intended for human consumption for each of the components.

4. We suggest that since Allied cannot reasonably immediately comply with their intention to neutralize the waste, the permit should be issued as planned, with all of the special conditions as originally



intended by the IEPA, and that the neutralization be required to be added as soon as possible, in a year or so, and that appropriate, unnecessary, special conditions be dropped after the neutralization process is on line, 12 or 24 or 36 months from now. We do feel that there should be an opportunity for public input to which special conditions are to be dropped as a result of the neutralization, when and if it ever occurs.

5. We do not feel that the existing current permit conditions should be extended to cover the operation of the well while awaiting the neutralization process coming on-stream. We sorely need most of our and the IEPA's special conditions to protect our environment now! There is plenty of time to rescind any unnecessary requirements, if there are any, AFTER the neutralization process is on-stream. There is no need to delay the requirement of changes not affected by the neutralization process.
6. The closure procedures for the well do not require a continuous back fill of the well with acid-resistant cement. The procedure that has been accepted by the IEPA places concrete plugs at a few levels, and fills the interval between them with drilling mud. This procedure leaves the upper hole with over 3700 feet of mud, in addition to 2500 feet in the lower hole that is currently open. Since this mud is the only material present to prevent movement of fluids between strata at a later date, we ask that the closure plan be modified, and required to:
  - A. Remove the concrete plug at the bottom of the current well, and clean and back fill from the 6684 foot level to the surface, and
  - B. Back fill the entire hole with an approved acid-resistant

concrete.

7. The IEPA proposal to require monitoring wells should include at least 4 wells, one upgradient and three downgradient. Further, the first well should carefully explore the terrain completely down to the top of the upper confining zone, to insure that there is not any legal USDW between there and the 1000 foot level. If the first well more clearly defines the bottom of the actual USDW, the balance of the wells can be shallower.
8. Because of the significance of the changes in the proposed permit requirements, including both the IEPA's intention to require monitoring wells, and Allied's intent to neutralize the waste prior to injection, we ask the following changes be made to the permit:
  - A. That the proposed life of the permit be incorporated as a provision in the draft permit so that all who read it are aware of the proposed length of the permit, and
  - B. That the length of this permit be reduced from the IEPA's proposed three years, to two years. The changes involved in this disposal process are substantial, and a shorter re-permitting interval would ease permit requirements modernization. Three years is too long a life for a transitional permit such as this one, and would not allow the IEPA to insure that the permit is kept current with the changes in the technology and public policy occurring now. We certainly feel that Allied's request for a ten-year permit should be denied.
9. We have reiterated below the changes that we feel should be retained in this permit, and are required regardless of the neutralization issue. These changes are keyed to the page numbers in the draft

12/7/86

TO: Illinois Environment Protection Agency

RE: Renewal of Waste Well Permit for Allied Chemical  
of Danville, IL

I respectfully request our Illinois citizens be protected completely from the Allied Chemical Company pollution poured down the well in question because -

1. No one knows how far underground from the waste well the pollution has spread, horizontal and/or vertical. Since I have to depend on my own well water for my liquid needs, I sure don't want that well water contaminated with acids and/or arsenic poured into the waste well at the rate of 2% of 2 M gallon per month - 24 M gallon per year - 300 M gallons of mixed water and acids and arsenic dumped down the waste well in 13 years. That figures out to be 600,000 gallons in the 13 years. These rates were given out by Allied Chemical Company Plant Manager at the October 16, 1986 Public Meeting held to inform area citizens of Waste Well pollution.

The Plant Manager said the strata at the bottom of the 4,000 foot waste well was a type of strata sponge-like and was absorbing the over 300 M gallon of mixed waste of the last 13 years. If this is true, we have one very, very large sponge loaded with contaminated (600,000 gallon pure deadly pollution) with 300 million gallons of mixed pollution.

A point was raised that the acid could be absorbed by the eating away of the dolomite and/or limestone generally found at that depth. If this is true - we could have one very, very large cavity under all of us and eventually the gas from this action could possibly explode and cause one very great sink hole - a 300,000,000 gal. sink hole.

2. Along this same line of thought, this whole large area, an area of 3 to 5 miles in diameter from the Waste Well Head, could and probably is, polluted from at least the 4,000 feet level. Since this very large area (western Indiana and Eastern Illinois) is known for some very good mineral and gas rights, a very good chance of finding coal, oil and already gas flows in use, no new oil, gas wells nor coal mines could be opened up if acid and/or arsenic pollution is in the area. In my opinion, Allied Chemical Company should drill four monitoring wells at the 1/2 mile radius, 4 wells at the 1-mile radius, and 4 wells at the 3-mile radius and pay for monthly monitoring if waste well permit is granted, but should be required to shut Waste Water Well down until monitoring wells are in operation monitoring strata to the 4,000 foot level.
3. If any area off the Allied Chemical Company property is found to be contaminated, Allied Company should be shut down and Allied Chemical Company, and any and all parent companies should be sued for damages of lost mineral rights ruined because of polluted mineral area, plus area pollution.
4. We, as citizens of the State of Illinois and of the United States of America, are protected from off-color and polluted meats, etc. by U.S.D.A. protection of weight shortages as well as a lot of other protection laws, I think it's high time we citizens do get protection from such careless company operations. If the Illinois State Agency can't or won't protect us citizens, then we should immediately contact our National legislators for relief.
5. Legally, I'm protected from my next door neighbor from throwing trash and/or using or damaging my property, and the same holds true for him. My point is - these laws hold true not only to

he and I, but also holds true to Allied Chemical Company and me.

6. Now, for 13 years Allied nor I.E.P.A. evidently was not required to make a big splash over this pollution well. Maybe not legally for Allied, but if not legally for I.E.P.A. to inform Illinois citizens - it sure would have been a moral right to go all out to inform us citizens of any danger and to make any and all tests to insure our citizens' health.
7. A few years ago TeePak of Danville, IL was polluting the area air with their acid polluting holding lagoons. I think the I.E.P.A. really put a lawful pressure on TeePak to clean up their air pollution act. TeePak complained loudly of the cost to clean up their situation. They spent millions of dollars to clean up their act, and I applaud TeePak as well as I.E.P.A. for protecting us citizens. I see no difference between air or air plus ground pollution by TeePak nor Allied Chemical Company. Allied's Manager cried of the expensive cost to do away with their Waste Well and use other less citizen protection because of large costs.

Millions of dollars of pollution clean up of the acid and/or arsenic pollution is far, far more costly than the \$10,000 Illinois lawful death payment. (If my wife and I died from the acid and/or arsenic poisoning, the Allied out of pocket expense of \$20,000 would be a drop in the bucket in payment for our deaths from our well water/arsenic pollution.)

8. One I.E.P.A. member has told at least one of the area neighbors to just pack up and move if we, as neighbors, couldn't stand the pollution. Most of us neighbors have been living in this area longer than Allied has been around here. If we were polluting Allied Company property, one thing

for sure, I.E.P.A. and Allied would run us out of the country - tarred and feathered! Since the table is turned, let's face the situation rightly.

9. If the I.E.P.A. needs additional proof on the ground and water pollution, please make Allied shut the waste well down for at least March 1, 1987 to give me time enough to get my well water tests back from Illinois Public Health Agency. Sample was taken November 17, 1986, and it would take a little over 3 months to run the water sample.
10. Regardless of the expense to Allied, I please request you I.E.P.A. people to shut down Allied's Waste well and have Allied conduct other methods to dispose of their pollution waste in a true safe manner and not pollute the precious ground and water of our area.
11. In 1776 we won our freedom and rights from the British, so now in 1986 (210 years later) we have been lucky enough to have protection from large corporations that try to down trod on our citizens.

I sincerely hope you do your job and protect us citizens from being ravaged by our large "devil may care" attitudes.

Thank you,

ELMER E. ENGELMAN

*Elmer R Engelman*  
*Elmer R Engelman*  
R R #5, Box 314  
Danville, IL 61832

Phone 217-446-8017

Dec 17, 86  
12/17/86

ALLIED CHEMICAL COMPANY WASTE DISPOSAL WELL QUESTIONS

1. Where is the well located? No legal definition or description of well location exists. All gifts of value have a legal description- a car has a title - stocks and bonds have a printed description - house and lot, street, number and city, etc. No official legal description so no access to well head, real or phantom well head. Allied took Mr. John Shafer all over Allied's plant, but didn't let him near phantom or real well.
2. From 1972 to late 1986, no public hearing as to well use or location and still no definite answer to location of well or wells. Not legal action but sneaky action by Allied. In the meantime between 1972 and late 1986, the well in question was sold or given to a Chicago Bonding or holding company. How could Allied give or sell something of nothing. When was the transfer made?

Then later the well was sold or given to the State of Illinois? What and where is this something located? John Shafer and others are kept away from the supposed well head, but are kept quite far from supposed actual well head. If actual well exists is reason to keep people from being too close to well head area as waste wells have been known to rupture and explode. Is this a dangerous area? What area?

3. If State of Illinois owns phantom well - no citizens that are damaged by waste can even sue the State of Illinois, Allied Chemical or others since State of Illinois ownership of well, phantom or otherwise. Since Illinois citizens are the government of Illinois - they can't sue themselves - plus no well exists!
4. If State of Illinois owns the well in question now - can we, as the State of Illinois, charge Allied for use of well in question to discard waste pollution in question? If the well in question is a phantom well - is Allied for above reasons, is Allied dumping waste on Allied property surface?
5. If we as the citizens of Illinois and we are the government - why can't we as owners of real or phantom well in question shut that thing down? If we as owners of nothing in reality, can Allied be charged with dumping their waste on the surface?
6. How come only Allied Corporation has exclusive rights for area neighbors mineral rights? Story offered we can only hold any mineral rights below our property to the area we can get down to. If Allied can drill a well 6,000 feet we also can get an oil or gas well to those 6,000 feet ruining our changes for a gas or oil well to that depth because Allied has polluted and ruined that area without paying for our mineral rights.

Always remember and never forget, we area neighbors bought and paid for these mineral rights under our property even if we don't want to use these rights at this time. Rest assured Allied Chemical Corporation isn't being fair to us neighbors by checking to see if they are polluting on us neighbors property near and beyond Allied's property.

7. If Allied Chemical can spend great sums of money creating new products and fancy propellants. etc. that create toxic waste, then let Allied Corporation pay to neutralize those toxic wastes and Allied won't be needing either the real or phantom well to dispose of these toxic wastes to be trespassing on neighbors property, but if by use of this so called toxic waste well is or does pollute under or on my property, Elmer R. Engelman's property, let Allied Corporation be forced to pay me damages to my satisfaction, and Allied: - you can rest assured to settle damages to me will be every cent a jury will award me - I hope in the millions of dollars.
8. All of us area citizens should not have our property now or in the future ruined or destroyed by toxic waste pumped into a real or phantom well by Allied Chemical Corporation. Nor above all - our lives by an explosion or blow out admitted by Allied in the past at the waste well head of the acid and/or arsenic pollution blowing and away in the atmosphere and onto neighbors property.
9. Above all, Illinois Environment Protection Agency, please protect us area neighbors from the rough trodding Allied Chemical Corporation as our forefathers and foremothers stopped the British of the 1770's from trodding over us Illinois and United States citizens. Our forefathers fought to the death with ball and rifle to stop those British and their tactics, our foremothers at home by stringing heavy wires across roadway knee high from road side trees drawn real tight. This would main the horses and a lot of the riders. The foremothers also poisoned the well drinking water troughs and by the time the British soldiers became sick they were too far from the poison water to make it back to get even with these foremothers as in the articles I've read about the War of 1776 - 210 years ago.

So now, Allied Chemical Corporation is trying to do us American Citizens in by using the same poison tactics we played on the British troops in 1776.

Elmer R. Engelman  
R.R.#5, Box 314  
Danville, IL 61832  
Phone 217-446-8017



Copy to all involved  
12.86 meeting  
12/18/86

TO: Illinois Environmental Protection Agency this 17th day of December 1986

My summation of the Allied Chemical Corporation Disposal Well situation is this: Allied Chemical Corporation just wants to put a pollution solution containing 1% of the solution (acid) and 1% arsenic solution down the Hazardous Waste Injection in the deep well drilled to 6,000 feet and then decided to only deposit waste to the 4,000 foot level.

At a meeting of the Danville Citizens for Control of Hazardous Waste Injection, Mr. Rich Purgason, Allied's Plant Manager, attended and gave out with statements concerning their waste well. He stated no underground streams existed to carry waste away from the waste well site. On December 12, 1986 edition of The Commercial-News the "Peterson/Puritan Aerosol Firms Clean Water Plan at Finish." Mr. Thomas McKenna, President Peterson/Puritan, said the firm is constructing a perimeter interceptor system to collect contaminated groundwater along the northwest plant border by using a perforated pipe as Peterson/Puritan discovered an underground stream running west by northwest direction at great expense.

At the same meeting of Danville Citizens for Control of Hazardous Waste Injection, Mr. Purgason also stated Allied couldn't pay the cost of cleaning up their waste as way too expensive - no monitoring wells either. Allied hasn't the moral decency to protect us area citizens as Peterson/Puritan does.

Also at that meeting Mr. Purgason stated the idea is false of any underground streams - another falsehood.

At the same meeting Mr. Purgason stated waste water and/or pollution was being contained in a sponge-like strata. The December 15, 1986 Commercial-News edition, he states the wastes are sealed at the 4,000 foot level into a sealed formation. How does he know the surrounding strata at that level under the Allied Plant proper without expensive monitoring wells? He has told so many wild data maybe he has employed little people in wet suits carrying ice cream dippers of concrete to seal off the strata under their plants 58 acres. I've also heard for the last 65 years the world would come to an end real soon. That also has turned out to be false.

Also, in the December 15 edition, Mr. Purgason stated that the waste well area at 4,000 feet is surrounded by solid bedrock formation - this reason and also the reason of gravitational pull, the waste cannot rise. Has he checked any area drinking water wells? I don't think so.

Of any and all of his falsehood statements (I'd judge to be 98%), this I do hope is a falsehood. If the waste pollution ever goes down by gravitational pull to the molten mantle more than 2,000 miles below the earth's surface into the molten mass by any reason - say an earth quake this Allied acid and/or arsenic waste should ever get together - a very large area of citizens and/or surface ruined by eruption.

For all the above reasons, I beg you to refuse any and all permits to let Allied's waste well to continue any and all use immediately.

Let Allied Chemical Corporation go to the expense of neutralizing their waste as Illinois Environment Protection Agency made TEEPAC a few years back by neutralizing their waste at a very, very high expense.

Also by Peterson/Puritan large expense they cleaned up their act by the Illinois Environmental Protection Agency.

Sir: Please exercise your legal rights and make Allied Chemical Corporation neutralize their waste and their waste well will not be needed and pose a tragic death to area citizens and area.

It's very tiring and boring to treat you people and us citizens as being so dumb and stupid that we can't see through Mr. Purgason's falsehoods.

Elmer R. Engelman  
R.R.#5, Box 314  
Danville, IL 61832  
Phone 217-446-8017